

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: SARA JEAN FRANCO : CHAPTER 13  
DEBTOR : CASE NO. 17-17031 elf

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SPECIALIZED LOAN SERVICING LLC, as  
servicer for BNY MELLON f/k/a THE BANK  
OF NEW YORK successor

*Movant*

vs

Sara Jean Franco.....Debtor  
Alejandro Franco.....Co-Debtor

William C. Miller, Esq. .....Trustee

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**DEBTOR'S ANSWER TO SPECIALIZED LOAN SERVICING LLC'S  
MOTION FOR RELIEF FROM STAY**

**1. Denied that Movant is servicer for the Real Party in interest. Strict proof of such demanded.**

**2. Admitted.**

**3. Denied that "Movant" is the holder of the mortgage; to the contrary, the "Movant" is Specialized Loan Servicing LLC according to the pleading. The owner is another entity according to the pleading.**

**4. Admitted.**

**5. Admitted.**

**6. Denied. Debtor has no knowledge of any payments made by co-debtor and therefore must deny the allegation and demand strict proof.**

**7. Denied. Strict proof demanded.**

**8. Denied as stated.**

**9. Denied as a conclusion of law. By way of further answer, No service has been made upon co-debtor who resides other than at the address served. Furthermore, Movant knows of co-debtor's address, yet failed to serve him there, as is stated in the Certificate of Service.**

**10. Denied as a request for future declaratory relief. Furthermore, whatever remedies are available to movant, remain available even if relief were to be granted.**

**WHEREFORE, Debtor request your honorable court to deny the said Motion.**

Respectfully submitted,

/s/ Joseph F. Claffy  
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